

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Richmond Division

ROBERT DAVID STEELE)

et al)

Plaintiffs,)

v.)

Case 3:17-cv-601-MHL

JASON GOODMAN)

et al)

Defendants.)

NOTICE REGARDING STIPULATIONS

Plaintiffs, Robert David Steele and Earth Intelligence Network (“Plaintiffs”), by counsel, file this Notice regarding efforts undertaken to obtain and file written stipulations of uncontroverted facts:

1. Pursuant to Paragraphs 37 and 38 of the Court’s Initial Pretrial Order [ECF No. 157] and the Court’s Order entered on April 16, 2020 [ECF No. 191], the parties were directed to confer and file written stipulations of uncontroverted facts.

2. On July 1, 2020, Plaintiffs’ counsel reached out to Defendant Goodman to discuss stipulations.

3. On July 3, 2020, Plaintiffs’ counsel and Goodman spoke via telephone about possible stipulations and other matters.

4. On July 9, 2020, Plaintiffs’ counsel emailed a draft of proposed stipulations of uncontroverted fact, a copy of which is attached as Exhibit “A”.

5. On July 10, 2020, Plaintiffs' counsel followed up with Mr. Goodman regarding potential stipulations.

6. Plaintiffs' counsel received no response.

7. The deadline for filing stipulations is July 10, 2020 at 5:00 p.m.

9. Despite good faith efforts, Plaintiffs' counsel was unable to reach any agreements with Mr. Goodman concerning uncontroverted facts

DATED: July 10, 2020

ROBERT DAVID STEELE
EARTH INTELLIGENCE NETWORK

By: /s/ Steven S. Biss
Steven S. Biss (VSB # 32972)
300 West Main Street, Suite 102
Charlottesville, Virginia 22903
Telephone: (804) 501-8272
Facsimile: (202) 318-4098
Email: stevenbiss@earthlink.net

Counsel for the Plaintiffs

CERTIFICATE OF SERVICE

I hereby certify that on July 10, 2020 a copy of the foregoing was filed electronically using the Court's CM/ECF system, which will send notice of electronic filing to counsel of record and all interested parties receiving notices via CM/ECF, and a copy was emailed in PDF to Defendants, Goodman and Lutzke.

By: /s/ Steven S. Biss
Steven S. Biss (VSB # 32972)
300 West Main Street, Suite 102
Charlottesville, Virginia 22903
Telephone: (804) 501-8272
Facsimile: (202) 318-4098
Email: stevenbiss@earthlink.net

Counsel for the Plaintiffs